

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE:

W. R. GRACE & CO., et al.¹

Debtors.

x Chapter 11

: Case No. 01-1139 (JKF)
: (Jointly Administered)

: Hearing Date: June 1, 2009 at 10:30 a.m.

x

SUPPLEMENTAL MEMORANDUM OF KANE PIPE LINE OPERATING PARTNERSHIP,
L.P. AND SUPPORT TERMINAL SERVICES, INC. IN SUPPORT OF MOTION FOR
ORDER MODIFYING THE AUTOMATIC STAY [Concerning Docket Nos. 20538 and 20846]

DOCUMENTS FILED UNDER SEAL²

April 13, 2009

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¹ The Debtors consist of 62 entities, including W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and the particular debtor involved in this Motion, Grace Energy Corporation.

² These papers are filed under seal in accordance with the Court's oral ruling and the Certification of Counsel and Proposed Form of Order re: that oral ruling [Docket No. 21214].